

20-022C NELSON

DECLARATION OF WILLIAM NELSON

WILLIAM NELSON, hereby declares under the penalty of law that the following is true and correct:

1. I am over 18 years of age and reside in Pierre, South Dakota. I am making this declaration under my own free will.

2. I understand that the copyright owners have evidence that my email address “wlnelson6@hotmail.com” was used to download torrent files from the website YTS for copying the motion pictures: *Hunter Killer* on 2019-01-19 from Internet Protocol (“IP”) address 89.187.178.220; *Extremely, Wicked Shockingly Evil and Vile* on 2019-07-07 from IP address 89.187.178.220; *The Last Full Measure* on 2020-01-21 from IP address 89.187.178.158 and *The Brass Teapot* on 2019-07-24 from IP address 64.33.78.157 assigned to my Internet service from Virtual Private Network (“VPN”) NordVPN, Hide My Ass (“HMA”) and Midco as alleged in the First Amended Complaint (“FAC”) in Civil Action 1:20-cv-2842 in Colorado.

3. I also understand that the copyright owners have evidence that a BitTorrent Client app was used at the above IP addresses and IP address 5.62.59.59 to further download and share copies of the motion pictures *Angel Has Fallen*, *The Professor And The Madman*, *The Last Full Measure*, *Hunter Killer*, *After*, *Extremely Wicked Shockingly Evil And Vile*, *Acts Of Vengeance*, *Blunt Force Trauma*, *Skin*, *Disturbing the Peace*, *Once Upon a Time in Venice*, *Rambo V: Last Blood*, *London Has Fallen*, *Hellboy*, *All Eyez on Me*, *The Brass Teapot* and *Mechanic: Resurrection* under the file names shown in Exhibit “4” to the FAC.

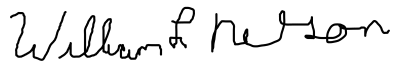
4. Although I admit to using a VPN and Internet service in which the above IP addresses were assigned to me, I deny using the website YTS to download the torrent files and using a BitTorrent Client app to download the motion pictures. I believe a friend of mine named “Ty Love” who was a regular guest at my home and that I allowed Ty Love to use my computer is responsible. I confronted Ty Love

when I noticed that he was downloading torrent files from my computer but he told me that he was only downloading legal torrents.

5. I understand that the agent for the Copyright Owners has sent infringement notices to Internet Service Providers of the IP addresses for where infringement has been confirmed. I never received any infringement notices or warning from Midco, NordVPN or Hide My Ass VPN. I would have immediately made Ty Love cease using the BitTorrent Client had I received any notices.

I declare under penalty of perjury of the laws of United States that the foregoing is true and correct.

DATED: Pierre, South Dakota November 17, 2020.

A handwritten signature in cursive script that reads "William F. Nelson".

1-18-2021

WILLIAM NELSON

212 W. Prospect, Pierre,

SD